

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, et al.,¹

Debtors.

Chapter 7

Case No. 23-11069(CTG)

Re: D.I. 378 & 426

**JOINDER OF MULTNOMAH COUNTY, OREGON TO OBJECTION OF
ORANGE BATAVIA I, LLC TO MOTION OF THE DEBTORS FOR
ENTRY OF AN ORDER (I)(A) APPROVING BIDDING PROCEDURES
FOR THE SALE OR SALES OF THE DEBTORS' ASSETS, ETC. [D.I. 426]**

Multnomah County, Oregon (“Multnomah”), creditor of certain of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through its undersigned counsel, respectfully submits this joinder to the *Objection of Orange Batavia I, LLC to Motion of the Debtors for Entry of an Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors’ Assets, Etc. [D.I. 426]* (the “Objection”)², solely to the extent set forth herein.

Specifically, Multnomah joins in the arguments set forth in ¶¶ 6-12, 14-19 of the Objection, incorporates these specific arguments in the Objection as if set forth herein, and respectfully requests that, for the reasons set forth therein, the Debtor’s proposed bidding procedures set forth in the Sales Procedures Motion be revised to provide adequate time for parties to receive necessary information, prepare and present objections to the Debtor’s sale of assets, if any, and arrange for witnesses to appear at any contested sale hearing.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

Dated: September 8, 2023
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Joseph C. Barsalona II

Joseph C. Barsalona II (DE Bar No. 6102)
1007 North Orange Street, 4th Floor, #183,
Wilmington, DE 19801

Telephone: (302) 592-6497

Facsimile: (201) 488-5556

Email: jbarsalona@pashmanstein.com

-and-

SUSSMAN SHANK LLP

Garrett S. Eggen (DE Bar No. 6655)
1000 SW Broadway, Suite 1400
Portland, OR 97205

Telephone: (503) 227-1111

Email: geggen@sussmanshank.com

Counsel to Multnomah County, Oregon